Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, '10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia. In accordance with 9 VAC 5-80-240, this permit supersedes the Title V permit dated January 9, 2002.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Kaiser Bellwood Corporation

Facility Name: Kaiser Bellwood Corporation

Facility Location: 1901 Reymet Road Richmond, VA 23237

Registration Number: 50249
Permit Number: PRO50249

September 25, 2002

Effective Date

September 25, 2007 Expiration Date

Robert G. Burnley

Director, Department of Environmental Quality

<u>September 25, 2002</u>

Signature Date

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I. Facility Information

Permittee/Facility

Kaiser Bellwood Corporation 1901 Reymet Road Richmond, VA 23237

Responsible Official

Chris Timmer Plant Manager (804) 743-6377

Contact person

Chuck Wilusz Environmental Manager (804) 743-6493

AIRS Identification Number: 51-041-0003

Facility Description: SIC Code 3354 - The facility is an aluminum extruded product manufacturing facility (SIC 3354) which is operated by Kaiser Bellwood Corporation. Various forms of pure aluminum, alloyed aluminum scrap, and alloying metals are blended together melted in one of three remelt furnaces which compose the Remelt Operations (UO1-1 to UO1-3). Each of the remelt furnaces are fired primarily by natural gas and use propane as a back-up fuel.

From the remelt furnaces the metal flows through troughs to fluxing ladles or crucibles. During fluxing of the aluminum, fluxing gas and salt liberates undesired entrapped gasses and causes suspended solids to rise to the molten surface. These solids (dross) are removed and cooled in an open mold pan.

After the fluxing ladles the aluminum enters the casting pits where it is cast into billets (sometimes called logs). The billets then enter the homogenizing furnaces (U21, U22, and U23), which are fired primarily by natural gas and use propane as a back-up fuel, or may be sent directly to the billet saws which follow the homogenizing furnaces.

After sawing, the billets enter one of six aluminum billet heaters (three of which, U31, U32, and U33, are significant emission units) fired primarily by natural gas with propane as a back-up fuel. Next, the heated billets are extruded to form the desired product. Dies used in the extrusion process are periodically cleaned at the Caustic Cleaning Station (U40).

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Particulate emissions which occur during the cleaning of the dies are controlled by a wet scrubber (CD40).

After the extruded product is cooled with a water spray, solvent from the Varsol Degreaser and Parts Washers (U50) is used to clean any remaining lubricants from approximately 15% of the extruded products..

II. Significant Emission Units

A. Process Units

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity
UO1-1	S01-1	Remelt Furnace #1 at 40,000 lb.	Reynolds Metals Company	22.0 Million BTU/hr.
UO1-2	SO1-2	Remelt Furnace #2 at 40,000 lb.	Reynolds Metals Company	18.0 Million BTU/hr.
UO1-3	SO1-3	Remelt Furnace #3 at 40,000 lb.	Reynolds Metals Company	18.0 Million BTU/hr.
U21	S21	Homogenizing Furnace	Sunbeam Corporation	20 Million BTU/hr.
U22	S22	Homogenizing Furnace - K1	Timco	12 Million BTU/hr.
U23	S23	Homogenizing Furnace - K2	Timco	12 Million BTU/hr.
U31	S32	Aluminum Billet Heater No.2	Granco Clark Model 914-35- 4-S No.2	13 Million BTU/hr.
U32	S32	Aluminum Billet Heater No.6	Granco Clark Model 1116- 45-4 Hotjet	9 Million BTU/hr.
U33	S33	Aluminum Billet Heater No.7	Granco Clark Model 1418- 65-6 Hotjet	12.6 Million BTU/hr.
U10	S10	Dross Cooler	Rotary Dross Cooler	5,000 lb/hr. Input

Emission Unit No.	Stack No.	Emission Unit Description	Manufacturer and Date of Construction	Size/Rated Capacity
U40	S40	Caustic Cleaning Station	Caustic Cleaning Station	17,000 lb/hr. Output
U50	Fugitive	Varsol Degreaser and Parts Washers	Varsol Degreaser and Parts Washers	885.5 cubic feet

B. Pollution Control Equipment

Stack No./ Emission Unit No.	Control Equipment Description	Manufacturer and Date of Construction	Size/Rated Capacity	Pollutant
S10 - U10	Filter - baghouse	Wheelabrator Jet 3, Model 108	99.5%	Particulate
S40 - U40	Absorber - packed tower	Heil Fume Scrubber Series 734	99%	Particulate

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III. Reynolds Remelt Furnace #1 (Emission Unit ID # UO1-1)

A. Limitations

1. The approved fuels for remelt furnace #1's burners are No. 2 oil and natural gas. A change in the fuel may require a permit to modify and operate.

(9 VAC 5-20-110 of State Regulations, Condition #7 of the 2/28/80 NSR permit)

2. Emissions from the operation of the remelt furnace #1's (ref. #UO1-1) burners shall not exceed the limits specified below:

<u>Pollutants</u>	<u>lb/hr</u>	tons/yr
Particulate Matter	0.31	1.38
Sulfur Dioxide	6.69	29.27
(9 VAC 5-50-260 and 9 VAC 5-50-180 of State	Regulations.	Conditions #2 and
#3 of the 2/28/80 NSR permit)	-	

3. Emissions from the operation of remelt furnace #1 (ref. #UO1-1) shall not exceed the limits specified below:

Particulate Matter 9.05 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 4. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - a. The yearly throughput of natural gas to melt furnace #1, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - b. The yearly throughput of distillate oil to melt furnace #1, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - c. The sulfur content of each shipment of distillate oil received at the facility, the quantity of oil in each such shipment, the date each such shipment was received at the facility, and the method used to determine the sulfur content.

d. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Conditions #2 and #3.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 E of State Regulations)

C. Reporting

5. The permittee shall report the records of any fuel oil sulfur content data, required by Condition #4 above, that demonstrates that the fuel oil sulfur content exceeded 0.3% sulfur by weight. The permittee shall also report the length of time any such oil was fired in melt furnace #1 and the corrective actions taken to return melt furnace #1 to normal operating conditions. This report shall be sent to the Director, Piedmont Regional Office. (9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations)

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IV. Reynolds Remelt Furnace #2 (Emission Unit ID # UO1-2)

A. Limitations

6. Emissions from the operation of UO1-2 shall not exceed the limit specified below:

Particulate Matter 9.05 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 7. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #6.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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V. Reynolds Remelt Furnace #3 (Emission Unit ID # UO1-3)

A. Limitations

8. Emissions from the operation of remelt furnace #3 (ref. #UO1-3) shall not exceed the limit specified below:

Particulate Matter 9.05 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 9. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #8.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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VI. Secondary Aluminum Processing Unit (Emission Unit ID # UO1-1, UO1-2, UO1-3)

A. Emission Limitations

10. Dioxins/Furans (D/F) Emissions from the secondary aluminum processing unit (consisting of UO1-1, UO1-2 and UO1-3) shall not exceed the following for any 3-day, 24-hour rolling average period:

15.0 ug of D/F TEQ per Mg (0.00021 gr of D/F TEQ per ton) of feed/charge

Alternatively, the permittee may demonstrate compliance with this emission limitation by demonstrating that each emissions unit (U01-1, U01-2 and U01-3) is in compliance with the emission limitation listed above.

(40 CFR 63.1505(i)(3),(k)(3),(k)(5))

B. Operating Requirements

- 11. The permittee shall operate the secondary aluminum processing unit in accordance with the following operating requirements:
 - a. The permittee shall provide and maintain labels at each unit (U01-1, U01-2 and U01-3) that identifies the applicable emission limitations and means of compliance, including:
 - i. The type of the affected source or emission unit; and
 - ii. The applicable operational standards and control methods. This includes, but is not limited to, the type of charge to be used for a furnace, flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan (Condition #12(b)).
 - b. The permittee shall install, calibrate, operate and maintain a device, or devices, that measures and records or otherwise determines the weight of feed/charge of each furnace (U01-1, U01-2 and U01-3) for each operating cycle or time period used in the performance test (Condition #13). The weight measurement system(s) shall be operated in accordance with the OM&M plan (Condition #12(b)).
 - c. The permittee shall operate each furnace (U01-1, U01-2 and U01-3) in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan (Condition #12(b)). (40 CFR 63.1506(b),(d),(n)(2))

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C. Monitoring Requirements

12. The permittee shall monitor the secondary aluminum processing unit in accordance with the following monitoring requirements:

- a. The permittee shall prepare and implement a written operation, maintenance and monitoring plan (OM&M) addressing each furnace (U01-1, U01-2 and U01-3). The initial plan and any subsequent amendments shall be submitted to the Director, Piedmont Regional Office for review and approval. Each plan shall contain the following information:
 - i. Process parameters to be monitored to determine compliance, along with established operating levels of ranges, as applicable, for each furnace (U01-1, U01-2 and U01-3).
 - ii. A monitoring schedule for each furnace (U01-1, U01-2 and U01-3).
 - iii. Procedures for the proper operating and maintenance of each furnace (U01-1, U01-2 and U01-3).
 - iv. Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer instructions.
 - v. Procedures for monitoring the process parameters, including the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
 - vi. Corrective actions to be taken when process or operating parameters deviate from the value or range established in paragraph (a)(i) of this condition, including:
 - (1) procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and
 - (2) procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
 - vii. A maintenance schedule for each furnace (U01-1, U01-2 and U01-3) that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
 - vii. Documentation of the work practice and pollution prevention measures used to achieve compliance with the applicable emission limitations and a site-specific monitoring plan as required in (d) of this Condition for emissions units U01-1, U01-2 and U01-3.
- b. The permittee shall inspect the labels required by Condition #11(a) for each furnace (U01-1, U01-2 and U01-3) at least once per calendar month to confirm the labels are intact and legible.

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c. Each weight measurement device required by Condition #11(b) shall have an accuracy of +/- 1 percent of the weight being measured. The permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no schedule is specified, at least once every six months.

- d. The permittee shall develop a written site-specific monitoring plan. The site-specific monitoring plan shall be a part of the OM&M plan that addresses monitoring and compliance requirements for Dioxin/Furan emissions. The site-specific monitoring plan shall be submitted to the Director, Piedmont Regional Office for review and approval. The site-specific monitoring plan shall include, but is not limited to, the following information:
 - Documentation of each work practice, equipment/design practice, pollution prevention practice, or other measure used to meet the applicable emission standards.
 - ii. Provisions for unit labeling and feed/charge weight measurement as required by (b) and (c) of this Condition.
 - iii. If a scrap inspection program is included, provisions for the demonstration and implementation of the scrap inspection program in accordance with all applicable requirements in 40 CFR 63.1510(p).
- e. Within the OM&M plan required by (a) of this Condition, the permittee shall include the following relative to the secondary aluminum processing unit (U01-1, U01-2 and U01-3):
 - i. the identification of each emissions unit in the secondary aluminum processing unit (SAPU);
 - ii. the specific control technology or pollution prevention measure to be used for each emissions unit in the SAPU and the date of its installation or application;
 - iii. the emission limitation calculated for each SAPU and performance test results with supporting calculations demonstrating initial compliance with each applicable emission limitation;
 - iv. information and data demonstrating compliance for each emissions unit with all applicable design, equipment, work practice or operational standards of 40 CFR 63 Subpart RRR; and
 - v. the monitoring requirements applicable to each emissions unit in a SAPU and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in (f) of this condition.
- f. The permittee shall calculate and record the 3-day, 24-hour rolling average emissions of Dioxin/Furans (D/F) for the SAPU on a daily basis. To calculate the 3-day, 24-hour rolling average, the permittee shall:

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i. Calculate and record the total weight of material charged to each emission unit in the SAPU for each 24-hour day of operation using the feed/charge weight information required in (c) of this Condition.

- ii. Multiply the total feed/charge weight to the emissions unit for each emission unit for the 24-hour period by the emission rate (in lb/ton of feed/charge) for that emissions unit (as determined during the performance test) to provide emissions for each emissions unit for the 24-hour period, in pounds.
- iii. Divide the total emissions for each SAPU for the 24-hour period by the total material charged to the SAPU over the 24-hour period to provide the daily emission rate for the SAPU.
- iv. Compute the 24-hour daily emission rate using Equation 4 of 40 CFR 63.1510(t).
- v. Calculate and record the 3-day, 24-hour rolling average for D/F each day by summing the daily emission rates for D/F over the 3 most recent consecutive days and dividing by 3.

(40 CFR 63.1510(b),(c),(e),(o),(s),(t))

D. Performance Test/Compliance Requirements

- 13. The permittee shall comply with the following performance test requirements:
 - a. Prior to conducting the performance test required by (d) of this Condition, the permittee shall prepare and submit a site-specific test plan meeting the requirements of 40 CFR 63.7(c).
 - b. Following the approval of the site-specific test plan required by (a) of this Condition, the permittee shall demonstrate initial compliance with the D/F emission limitation and all equipment, work practice, or operational standard associated with this standard for each affected source and emissions unit (UO1-1, UO1-2, UO1-3, SAPU), and report the results in the notification of compliance status report as described in Condition #14(b). The permittee shall conduct all performance tests according to the requirements of 40 CFR 63 Subparts A and RRR (63.1511 and 63.1512). The permittee shall conduct each test while the affected source or emissions unit is operating at the highest production level with charge materials representative of the range of materials processed by the unit and, if applicable, at the highest reactive fluxing rate.
 - c. The permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limitation or standard. To establish the minimum and maximum value or range, the permittee must use the appropriate procedures in 40 CFR 63 Subpart RRR and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report.

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d. Except as provided for in 40 CFR 63.1511(f), the permittee shall conduct a performance test on each furnace (UO1-1, UO1-2, UO1-3) to measure the emissions of D/F at the furnace exhaust outlet.

- e. The permittee shall include data and information demonstrating compliance with the applicable emission limits in the site-specific monitoring plan required by Condition #12(d).
- f. During the emission test required by (d) of this Condition, the permittee shall measure and record the total weight of feed/charge to each furnace for each of the three runs and calculate and record the total weight.
- g. The permittee shall submit the information described in 40 CFR 63.1515(b)(3) as part of the notification of compliance status report to document conformance with the operational standard in 40 CFR 63.1506(b).

(40 CFR 63.1511(a),(b),(g); 40 CFR 63.1512(e),(j),(k),(r))

E. Notification Requirements

- 14. The permittee shall submit the following notifications:
 - a. As required by 40 CFR 63.9(e) and (f), the permittee shall provide notification of the anticipated date for conducting performance tests. The permittee shall notify the Director, Piedmont Regional Office, of the intent to conduct a performance test at least 60 days before the performance test is scheduled.
 - b. The permittee shall submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification shall be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report shall include:
 - i. All information required in 40 CFR 63.9(h). The permittee shall provide a complete performance test report of each affected source and emission unit for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations.
 - ii. Unit labeling as described in Condition #11(a), including process type or furnace classification and operating requirements.
 - iii. The compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value, including the operating cycle or time period used in the performance test.
 - iv. Approved OM&M plan (including site-specific monitoring plan).
 - v. Startup, shutdown and malfunction plan, with revisions.

(40 CFR 63.1515(a),(b))

F. Reporting Requirements

- 15. The permittee shall submit the following reports as required below:
 - a. The permittee shall develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process equipment used to comply with the standard. The permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40CFR63.6(e)(3). In addition to the information required in 40CFR63.6(e)(3), the plan shall include:
 - i. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
 - ii. Corrective actions to be taken in the event of a malfunction of a process or control devise, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
 - b. Pursuant to 40 CFR 63.10(e)(3), the permittee shall submit semiannual reports within 60 days after the end of each 6-month period. Each report shall contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the permittee shall submit a report stating that no excess emissions occurred during the reporting period. A report shall be submitted if any of these conditions occur during a 6-month reporting period:
 - i. An excursion of a compliant process or operating parameter value or range (e.g., definition of acceptable scrap, or other approved operating parameter).
 - ii. An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
 - iii. An affected source (UO1-1, UO1-2, UO1-3) was not operated according to the requirements of 40 CFR 63 Subpart RRR.
 - iv. A deviation from the 3-day, 24-hour rolling average emission limitation for the SAPU (UO1-1, UO1-2, UO1-3).
 - v. The permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

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- c. For the purpose of annual certifications of compliance required by this permit, the permittee shall certify continuing compliance based upon, but not limited to, the following conditions:
 - i. Any period of excess emissions, as defined in (b) of this Condition, that occurred during the year were reported as required by (b) of this Condition; and
 - ii. All monitoring, record keeping, and reporting requirements were met during the year.

(40 CFR 63.1516(a),(b),(c))

G. Recordkeeping Requirements

- 16. The permittee shall maintain the following records:
 - a. Pursuant to 40 CFR 63.10(b), the permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63 Subparts A and RRR. The permittee shall retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records shall be retained at the facility. The remaining 3 years of records may be retained off site.
 - b. In addition to the general records required by 40 CFR 63.10(b), the permittee shall maintain records of:
 - i. For each furnace (UO1-1, UO1-2, UO1-3), records of feed/charge weights for each operating cycle or time period used in the performance test.
 - ii. Approved site-specific monitoring plan for each furnace (UO1-1, UO1-2, UO1-3) with records documenting conformance with the plan.
 - iii. Records of monthly inspections for proper unit labeling for each furnace (UO1-1, UO1-2, UO1-3).
 - iv. Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
 - (A) startup, shutdown, and malfunction plan;
 - (B) OM&M plan; and
 - (C) site-specific SAPU emission plan.
 - v. For the SAPU (UO1-1, UO1-2, UO1-3), records of total charge weight for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions. (40 CFR 63.1517(a),(b))

H. General

17. Except as specified in this permit, the facility is to be operated in accordance with the requirements of 40 CFR 63 Subpart A (as identified in Appendix A of 40 CFR 63 Subpart RRR) and 40 CFR 63 Subpart RRR. (40 CFR 63 Subpart RRR; 40 CFR 63 Subpart A)

18. For each condition in this permit requiring the measurement and recording of aluminum feed/charge weight, the permittee may choose to measure and record aluminum production weight rather than feed/charge weight provided that all requirements of 40 CFR 63.1506(d)(3) are met. (40 CFR 63.1506(d)(3))

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VII. Sunbeam Homogenizing Furnace (Emission Unit ID # U21)

A. Limitations

19. Emissions from the operation of U21 shall not exceed the limit specified below:

Particulate Matter 36.00 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 20. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #19.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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VIII. Timco Homogenizing Furnace (Emission Unit ID # U22)

A. Limitations

21. Emissions from the operation of U22 shall not exceed the limit specified below:

Particulate Matter 28.50 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 22. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #21.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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IX. Timco Homogenizing Furnace (Emission Unit ID # U23)

A. Limitations

23. Emissions from the operation of U23 shall not exceed the limit specified below:

Particulate Matter 28.50 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 24. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #23.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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X. Aluminum Billet Heater No. 2 (Emission Unit ID # U31)

A. Limitations

25. Emissions from the operation of U31 shall not exceed the limit specified below:

Particulate Matter 16.65 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 26. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #25.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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XI. Aluminum Billet Heater No. 6 (Emission Unit ID # U32)

A. Limitations

27. Emissions from the operation of U32 shall not exceed the limit specified below:

Particulate Matter 20.88 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 28. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #27.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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XII. Aluminum Billet Heater No. 7 (Emission Unit ID # U33)

A. Limitations

29. Emissions from the operation of U33 shall not exceed the limit specified below:

Particulate Matter 24.00 lbs/hr (9 VAC 5-40-2410 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 30. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #29.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

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XIII. Rotary Dross Cooler (Emission Unit ID # U10)

A. Limitations

- 31. Particulate emissions from the rotary dross cooler shall be controlled by a baghouse. The baghouse shall be provided with adequate access for inspection. The baghouse shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
 - (9 VAC 5-170-160 and 9 VAC 5-50-260 of State Regulations, Conditions #6 and #8 of Part I of the 8/25/86 NSR permit)
- 32. The annual operating time of the rotary dross cooler shall not exceed 2,000 hours, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
 - (9 VAC 5-170-160 of State Regulations, Condition #4 of Part I of the 8/25/86 NSR permit)
- 33. Emissions from the operation of the rotary dross cooler shall not exceed the limits specified below:

<u>Pollutants</u>	<u>lb/hr</u>	tons/yr
Particulate Matter	1.2	1.0

(9 VAC 5-50-260 and 9 VAC 5-50-180 of State Regulations, Condition #5 of Part I of the 8/25/86 NSR permit)

B. Periodic Monitoring and Recordkeeping

- 34. The permittee shall conduct the following monitoring:
 - monthly inspections of the baghouse and the differential pressure device installed on the baghouse listed in Condition #31. On any occasion that the baghouse or differential pressure device is found to be inoperable or in a malfunctioning state, the permittee shall conduct appropriate corrective action to return the baghouse and/or differential device to proper operation as expeditiously as possible.
 - (9 VAC 5-80-110 E of State Regulations)
- 35. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

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- a. The yearly operating time of the rotary dross cooler, calculated as the sum of each consecutive 12-month period (i.e. the 12-month rolling total).
- b. The results of the monthly inspections of the baghouse and differential pressure device required by Condition #34 and details of any corrective action taken as a result of these inspections.
- c. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #33 of this section.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations, Condition #3 of Part II of the 8/25/86 NSR permit)

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XIV. Caustic Cleaning Station (Emission Unit ID # U40)

A. Limitations

- 36. Particulate emissions from the caustic cleaning tanks shall be controlled by a 99% efficient scrubber (Heil Fume Scrubber Series 734). The scrubber shall be provided with adequate access for inspection. The scrubber shall be equipped with a water flow meter. The flow meter shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times. (9 VAC 5-80-10 and 9 VAC 5-50-260 of State Regulations, Condition #3 of the 10/26/95 NSR permit)
- 37. Emissions from the operation of the caustic cleaning station shall not exceed the limits specified below:

<u>Pollutants</u>	<u>lb/hr</u>	tons/yr
Particulate Matter	0.5	1.7
PM-10	0.5	1.7

(9 VAC 5-50-260 and 9 VAC 5-50-180 of State Regulations, Condition #7 of the 10/26/95 NSR permit)

38. Visible emissions from the scrubber serving the caustic cleaning station shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except for one 6-minute period in any one hour of not more than 30% opacity.

(9 VAC 5-50-20 and 9 VAC 5-50-260 of State Regulations, Condition #8 of the 10/26/95 NSR permit)

B. Periodic Monitoring and Recordkeeping

39. The scrubber serving the caustic cleaning station shall be observed visually at least once each operating week for at least a brief time period to determine if the unit has any visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the scrubber. If the scrubber is observed having any visible emissions, the initial observation shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded.

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40. The permittee shall conduct the following monitoring:

Once each operating day, the permittee shall obtain and record a reading from the water flow meter on the scrubber serving the caustic cleaning station. On any occasion that the scrubber or water flow meter is found to be inoperable or in a malfunctioning state, or the reading of the water flow meter indicates a water flow rate of less than 75 gallons per minute, the permittee shall conduct appropriate corrective action to return the scrubber and/or water flow meter to proper operation as expeditiously as possible.

(9 VAC 5-80-110 E of State Regulations)

- 41. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - a. The scrubber water flow rate records required by Condition #40 and details of any corrective action taken as a result of these records.
 - b. Records of the emission factors used to calculate the emissions of each pollutant with an emission limitation in Condition #37.
 - c. The results of the weekly visible emission inspections of the caustic cleaning station scrubber required by Condition #39 and details of any corrective action taken as a result of these inspections

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 E of State Regulations)

C. Reporting

- 42. The permittee shall report the results of any scrubber water flow meter reading, required by Condition #40 above, that demonstrates that the scrubber water flow rate was less than 75 gallons per minute. The permittee shall also report the length of time the scrubber was operated at such a reduced water flow and the corrective actions taken to return the scrubber to normal operating conditions. This report shall be sent to the Director, Piedmont Regional Office.
 - (9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations)
- 43. The permittee shall report the results of any 40 CFR Part 60 method 9 opacity test performed as a result of Condition #39 above. If the test indicates the facility is out of compliance with the standard contained in Condition #38 of this section, the source shall also report the length of time associated with any exceedance of the standard and

the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations)

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XV. Varsol Degreaser (Emission Unit ID # U50)

A. Limitations

44. No owner or other person shall use or permit the use of any cold cleaner unless such cleaner is equipped with a control method that will remove, destroy or prevent the discharge into the atmosphere of at least 85% by weight of volatile organic compound emissions. Achievement of this emission standard by use of the methods in Conditions #45, #46, and #47 will be acceptable to the board. (9 VAC 5-40-3280 C of State Regulations)

- 45. Emissions from the Varsol degreaser shall be controlled as follows:
 - a. Covers or enclosed remote reservoirs shall be provided. Covers shall be designed so that they can be easily operated with one hand. (Covers for larger degreasers may require mechanical assistance, by spring loading, counterweighting or powered systems). Enclosed remote reservoirs shall be designed such that they provide reduction effectiveness equivalent to that of a cover.
 - b. External or internal drainage facilities shall be provided to collect and return the solvent to a closed container or a solvent cleaning machine. The drainage facilities may be external for applications where an internal type cannot fit into the cleaning system.
 - c. A permanent label summarizing the operating procedures in Condition #46 shall be placed in a conspicuous location on or near the degreaser.
 - (9 VAC 5-40-3290 C1 of State Regulations)
- 46. The permittee shall operate the Varsol degreaser consistent with good operating practices including the following:
 - a. Waste solvent shall not be disposed of or transferred to another party, such that greater than 20% of the waste (by weight) can evaporate into the atmosphere. Waste solvent shall only be stored in closed containers.
 - b. The degreaser cover shall be closed whenever not handling parts in the cleaner.
 - c. Cleaned parts shall be drained for at least 15 seconds or until dripping ceases. (9 VAC 5-40-3290 C2 of State Regulations)
- 47. The permittee shall dispose of waste solvent from solvent metal cleaning operations by one of the following methods:

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- a. Reclamation (either by outside services or in-house)
- b. Incineration

(9 VAC 5-40-3290 D of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 48. The permittee shall conduct the following monitoring:
 - Once each operating week, the permittee shall conduct an inspection of the Varsol degreaser and a review of the Varsol degreaser operating practices to ensure that all applicable provisions of Conditions #44-#47 are being met. On any occasion that an applicable provision is not being met, the permittee shall conduct appropriate corrective action to return the Varsol degreaser to proper operation as expeditiously as possible.
 - (9 VAC 5-80-110 E of State Regulations)
- 49. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:
 - The results of the weekly inspections and reviews of the Varsol degreaser and its operating practices required by Condition #48 and details of any corrective action taken as a result of these inspections.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110 E of State Regulations)

C. Reporting

50. The permittee shall report the results of any inspection or review, required by Condition #48, that demonstrates that a requirement of Conditions #44-#47 is not being met. The source shall also report the length of time associated with any exceedance of such a standard and the actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office.

(9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations)

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XVI. Facility Wide Conditions

A. Limitations

51. Unless specified otherwise in this part, on or after the date on which the performance test required to be conducted by 9 VAC 5-50-30 is completed, no owner or other person shall cause or permit to be discharged into the atmosphere from any affected facility any visible emissions which exhibit greater that 20% opacity, except for one six-minute period in any one hour of not more than 30% opacity. Failure to meet the requirements of this section because of the presence of water vapor shall not be a violation of this section. This standard is applicable to the following emission units: UO1-1, UO1-2, UO1-3, U21, U22, U23, U31, U32, U33, and U10.

- 52. On and after March 24, 2003, Hazardous Air Pollutant (HAP) emissions from the operation of the facility shall not exceed 9.0 tons/yr for any single HAP and 24.0 tons/yr for total HAPs, calculated monthly as the sum of each consecutive 12 month period. (9 VAC 5-50-80 of State Regulations)
- 53. On and after March 24, 2003, the permittee shall perform no reactive liquid/gaseous fluxing, as defined by 40 CFR 63 Subpart RRR, in any furnace or fluxing device within the facility. The furnaces (UO1-1, UO1-2, UO1-3) shall only process clean scrap as defined within the site-specific monitoring plant required in Condition #54. (9 VAC 5-50-80 of State Regulations)
- 54. On and after March 24, 2003, the permittee shall develop a written site-specific monitoring plan to demonstrate compliance with the HAP emission limits of Condition #52 and the operating limits of Condition #53. The site-specific monitoring plan shall be included as an attachment to the OM&M required by Condition #12(a). Prior to any applicability date of 40 CFR 63 Subpart RRR, the site-specific monitoring plan shall be submitted to the Director, Piedmont Regional Office for review and approval. The site-specific monitoring plan shall address HAP metals and hydrogen chloride emissions. The site-specific monitoring plan shall include, but is not limited to, the following information:
 - a. A clean scrap specification for the furnaces (UO1-1, UO1-2, UO1-3)
 - b. A scrap inspection program meeting the requirements of 40 CFR 63.1510(p). If a scrap inspection program for D/F emissions is included in the OM&M plan, the permittee may use the same scrap inspection program for HAP metals and HCl emissions.
 - c. Performance test data for HCl emissions from the furnaces (UO1-1, UO1-2, UO1-3). The performances tests shall be conducted while the furnaces are operated

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within 80% of their maximum capacity with the worst-case feed material allowed by the scrap specification of (a) of this Condition.

- d. Records of the HCl emission factor determined during the performance tests required by (c) of this Condition, the monthly feed weight for each furnace and calculations of the monthly HCl emissions from each furnace.
- e. Records of the type and amount of any reactive solid fluxing performed at that facility and any HAP emissions, determined by material balance, resulting from this fluxing, calculated monthly.
- f. Records of metal HAP emissions from the each furnace (UO1-1, UO1-2, UO1-3), calculated monthly, and the emission factors and data used to determine these emissions.

(9 VAC 5-50-80 of State Regulations)

B. Periodic Monitoring and Recordkeeping

- 55. In order to minimize the duration and frequency of excess emissions, including visible emissions, due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
 - b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.
 - (9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations, Condition #42 of the 10/6/97 NSR permit)
- 56. The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided including names of trainees, date of training and nature of training. (9 VAC 5-170-160 and 9 VAC 5-50-20 of State Regulations, Condition #43 of the 10/6/97 NSR permit)
- 57. Each emissions unit with a visible emissions requirement in Condition #51 shall be observed visually at least once each calendar week for at least a brief time period to determine which operating emissions units have normal visible emissions (does not include condensed water vapor/steam), unless a 40 CFR 60 Appendix A Method 9 visible emissions evaluation is performed on the emissions unit. Each emissions unit observed having above-normal visible

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emissions shall be followed up with a 40 CFR 60 Appendix A Method 9 visible emissions evaluation unless the visible emission condition is corrected as expeditiously as possible and recorded, and the cause and corrective measures taken are recorded. (9 VAC 5-80-110 E of State Regulations)

C. Testing

58. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.

(VAC 5-40-30, 9 VAC 5-50-30, 9 VAC 5-80-110 and Condition # 7 of 9/22/97 NSR Permit)

59. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
SO_2	EPA Method 6
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

60. The permittee shall report the results of any 40 CFR Part 60 method 9 opacity test performed as a result of Condition #57. If the test indicates the facility is out of compliance with the standard contained in Condition #51, the source shall also report the length of time associated with any exceedance of the standard and the corrective actions taken to correct the exceedance. This report shall be sent to the Director, Piedmont Regional Office. (9 VAC 5-20-110, 9 VAC 5-50-50 and 9 VAC 5-80-110 E of State Regulations)

XVII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

	Т	-	T	F
Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
101	Locker Room Heater	5-80-720 C.	N/A	0.837 MMBTU/hr.
102	Oil/water separators	5-80-720 B.	VOC	N/A
103	Oil/water separator dump station	5-80-720 B.	VOC	N/A
104	Underground Varsol storage tanks	5-80-720 B.	VOC	30,000 gal. Each
105	No.2 fuel oil/diesel fuel storage tanks	5-80-720 B.	VOC	N/A
106	Extrusion press lubrication oils, hydraulic oils, motor oils, gear oils, transmission fluids, and used oils storage tanks and reservoirs	5-80-720 B.	VOC	N/A
107	Kerosene storage tanks	5-80-720 B.	VOC	3,000 and 1,000 gal.
108	Caustic etching station	5-80-720 B.	None	N/A
109	Casting pit lubrication	5-80-720 B.	VOC	N/A
110	Nitrogen generating plant	5-80-720 B.	None	N/A
111	Nitriting unit	5-80-720 B.	None	N/A
112	Laboratory hood	5-80-720 B.	PM	N/A
113	Cooling oil quench drum	5-80-720 B.	VOC	N/A
114	Die and machine shop ventilator and	5-80-720 B.	None, no longer operational	N/A

Emission Unit No.	Emission Unit Description	Citation (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
	collector			
115	Anhydrous ammonia tank	5-80-720 B.	NH3	300 gallons
116	Video ink jet stations	5-80-720 B.	VOC	10 stations
117	Pack/Ship, Billet, and press Finish saws	5-80-720 B.	PM	N/A
118	Wood shop saws	5-80-720 B.	PM	N/A
119	Billet, dye, and dummy block lubricants	5-80-720 B.	VOC	6 billet and 6 dye and dummy block operations
120	Carbon room dust collector	5-80-720 B.	PM	N/A
122	Space heaters (Natural Gas, Propane-Fired)	5-80-720 B.	PM,SO ₂ ,NO _x , VOC,CO	0.96 MMBTU/hr. each
123	Door heaters (Natural Gas, Propane-Fired)	5-80-720 B.	PM,SO ₂ ,NO _x , VOC,CO	0.85 MMBTU/hr. each
124	Age and age/anneal ovens (Natural Gas, Propane-Fired)	5-80-720 B.	PM,SO ₂ ,NO _x , VOC,CO	3 to 5 MMBTU/hr. each
125	Varsol still boiler (Natural Gas, Propane-Fired)	5-80-720 B.	PM,SO ₂ ,NO _x VOC	2.5 MMBTU/hr.
126	Caustic cleaning heating system (Natural Gas, Propane-Fired)	5-80-720 B.	PM,SO ₂ ,NO _x VOC,CO	1.692 MMBTU/hr.
127	Three billet heaters (Natural Gas, Propane - Fired)	5-80-720 B.	PM,SO ₂ ,NO _x VOC,CO	5 MMBTU/hr each

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

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XVIII. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
N/A		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

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XIX. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable. (9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless a timely and complete renewal application consistent, with 9 VAC 5-80-80, has been submitted, to the Department, by the owner, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.
 - (9 VAC 5-80-110 F)
- 2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than <u>March 1</u> and <u>September 1</u> of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, a deviation means any condition determined by observation, data from any monitoring protocol or any other monitoring which is required by the permit that can be used to determine compliance. Deviations include exceedances documented by continuous emission monitoring or excursions from control performance indicators documented through periodic or compliance assurance monitoring.

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than <u>March 1</u> each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to '114(a)(3) and '504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. A description of the means for assessing or monitoring the compliance of the source with its emissions limitations, standards, and work practices.
- 3. The identification of each term or condition of the permit that is the basis of the certification.
- 4. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the certification period.
- 5. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 6. The status of compliance with the terms and conditions of this permit for the certification period.
- 7. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall report by the next business day any deviations from permit requirements or any excess emissions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

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(9 VAC 5-80-110 F.2)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within two weeks provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit. (9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination,

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or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(9 VAC 5-80-110 G.4)

- 2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:
 - a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is the potential of, a resulting emissions increase;
 - b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;
 - c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emission cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;
 - d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;
 - e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;
 - f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);
 - g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and by 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the board, within a reasonable time, any information that the board may request in writing to determine whether cause exists for modifying, revoking and

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reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-305 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355.

(9 VAC 5-80-110 H)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited, to the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and
- 5. The prompt removal of spilled or traced dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-50)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80 Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the board if additional federal requirements become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

- No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
 (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.

 (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the board of the

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change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.
- 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

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V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The board may suspend, under such conditions and for such period of time as the board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substance subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A - F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required, under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

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AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110 except subsection N shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)